

ALEX G. TSE (CABN 152348)
Acting United States Attorney

BARBARA J. VALLIERE (DCBN 439353)
Chief, Criminal Division

MICHELLE J. KANE (CABN 210579)
MATTHEW A. PARRELLA (NYBN 2040855)
Assistant United States Attorneys

1301 Clay Street, Suite 340S
Oakland, California 94612
Telephone: (510) 637-3680
FAX: (510) 637-3724
michelle.kane3@usdoj.gov
matthew.parrella@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 16-00440 WHA
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	EXCLUDING TIME FROM JUNE 26, 2018,
v.)	THROUGH JULY 24, 2018.
)	
YEVGENIY ALEXANDROVICH NIKULIN,)	
)	
Defendant.)	
)	
)	

Defendant Yevgeniy Nikulin, represented by Arkady Bukh and Valery Nechay, and the United States, represented by Assistant United States Attorneys Michelle J. Kane and Matthew A. Parrella, hereby stipulate to the following:

1. The parties appeared before the Court on June 26, 2018, for a status conference;
2. The Court set the next appearance in the case on July 24, 2018, at 2:00 p.m. for a further status conference;
3. The Court, with the agreement of the parties, continued the previous complex case designation based on the nature of the prosecution, pursuant to 18 U.S.C. § 3161(h)(7)(B)(ii);

STIPULATION & ~~PROPOSED~~ ORDER
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1 4. The Court, also with the agreement of the parties, found that the time until the next
2 appearance was necessary for effective preparation of defense counsel, taking into account the exercise
3 of due diligence, pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv);

4 5. The parties agreed that the ends of justice served by excluding the period from June 26,
5 2018, through July 24, 2018, from Speedy Trial Act calculations outweigh the interests of the public and
6 defendant in a speedy trial, in accordance with 18 U.S.C. § 3161(h)(7)(A) and (B).

7 IT IS SO STIPULATED.

8 DATED: June 29, 2018

Respectfully submitted,

9 ALEX G. TSE
10 Acting United States Attorney

11 /s/
12 MICHELLE J. KANE
13 MATTHEW A. PARRELLA
 Assistant United States Attorneys

14 /s/
15 ARKADY BUKH
16 Counsel for Yevgeniy Alexandrovich
 Nikulin

17 /s/
18 VALERY NECHAY
19 Counsel for Yevgeniy Alexandrovich
 Nikulin


20 **ORDER**

21 Based upon the agreement of counsel at the June 26, 2018, status conference, and for good cause
22 shown, the Court finds that the case is complex based on the nature of the prosecution and that it is
23 therefore unreasonable to expect adequate preparation for pretrial proceedings or for the trial itself
24 within the time limits established by the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(B)(ii). Also based
25 upon the agreement of counsel, and for good cause shown, the Court finds that failing to exclude the
26 time between June 26, 2018, and July 24, 2018, would unreasonably deny counsel for the defendant the
27 reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18
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1 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by granting the
2 continuance outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §
3 3161(h)(7)(A). Therefore, IT IS HEREBY ORDERED that the time from June 26, 2018, through July
4 24, 2018, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A)
5 and (B)(ii), (iv).

6 IT IS SO ORDERED.

7 Dated: June 29, 2018.


HON. WILLIAM ALSUP
United States District Judge